

original
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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	MM Docket No. 99-275
Amendment of Section 73.202(b))	
Table of Allotments,)	RM-9704
FM Broadcast Stations,)	
(Keno, Oregon))	
(Merrill, Oregon))	
(Malin, Oregon))	
(Lakeview, Oregon))	
(Alturas, California))	

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COMMENT REGARDING COUNTER PROPOSAL

1. The construction permit for KHAT, which has facility ID number 65747, is owned by the Malin Christian Church, Inc. KHAT is currently authorized to operate on FM Channel 263A. FM channel 263A is a very restricted allocation and KHAT has been actively involved in trying to improve the allocation. The efforts to improve the allocation included the following:

1) Proposal for rule making to move to channel 264C2 and delete the 267C allocation at Alturas, California, which was rejected by the Commission.

2) Proposal for rule making to move to channel 265C1 and delete the 267C allocation at Alturas, California, which is still pending.

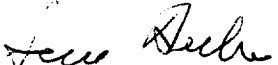
3) Application for one step to operate on FM Channel 265C1 and to correct allocation coordinates for channel 267 at Alturas, California, which is still pending.

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2. KHAT received a copy of the counter proposal comment proposed by Fatima Response, Inc., which was hand delivered by Pacific Radio Engineering. A copy of the counter proposal comment is attached. KHAT is in favor of the move from channel 263A to 237A. FM Channel 237A is not restricted and KHAT recommends that the Commission grant the counter proposal. KHAT would then amend their construction permit to channel 237A, file for a one step up-grade and withdraw the above mentioned applications for rule making and to amended the construction permit for operation on channel 265C1.

Dated: 15 Oct 99.



Sean Kelly, Assistant Director
Malin Christian Church, Inc.
PO Box 111
Keno, OR 97627
541-885-2184

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Washington, DC 20554

In the Matter of)	
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Table of Allotments,)	RM-9704
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(Lakeview, Oregon))	
(Alturas, California))	

COUNTER PROPOSAL COMMENT

Fatima Response, Inc., which is an Oregon non-profit non-commercial educational corporation, respectfully makes the following counter proposal:

<u>CITY</u>	<u>EXISTING CHANNEL</u>	<u>PROPOSED CHANNELS</u>
Keno, Oregon	253A	253A and 265A
Merrill, Oregon	289A	233A and 289A
Malin, Oregon	263A	237A
Lakeview, Oregon	228C2 and 237C1	228C2 and 235C1
Alturas, CA	233C1/267C	267C
	293C1 and 297C	293C1 and 297C

Renaissance Community Improvement Association, Inc. (BPED-950206MB) is one of two applications for a construction permit to use FM channel 253A at Keno, Oregon. Renaissance Community Improvement Association, Inc. would move to 265A without loss of cut-off protection, which would resolve its mutual exclusivity with St. Michael's Catholic Radio (BPED-950206MH).

St. Michael's Catholic Radio (BPED-950206MH) is one of two applications for a construction permit to use FM channel 253A at Keno, Oregon. This rule making would resolve its mutual exclusivity with Renaissance Community Improvement Association, Inc. (BPED-950206MB).

Fatima Response, Inc. (BPED-951108NE) is one of two applications for a construction permit to use FM channel 289A at Merrill, Oregon. Fatima Response, Inc. would move to 233A without loss of cut-off protection, which would resolve its mutual exclusivity with Klamath Basin Broadcasting (BPH-951102MA). Fatima Response, Inc. will apply for channel 233A if it is allotted and, if authorized, will build the station promptly.

Klamath Basin Broadcasting (BPH-951102MA) is one of two applications for a construction permit to use FM channel 289A at Merrill, Oregon. This rule making would resolve its mutual exclusivity with Fatima Response, Inc. (BPED-951108NE).

Malin Christian Church, Inc., which owns the construction permit for KHAT (BPED-950203MA) at Malin, Oregon, would move from 263A to 237A. The applicant has already talked to the Malin Christian Church, Inc. and they do not have any objection to the change in channel.

Woodrow Michael Warren, who owns the construction permit for KLCR (BPH-960619MF) at Lakeview, Oregon, would move from 237C1 to 235C1. The applicant has already talked to Woodrow Michael Warren and found out that the station is not currently being built because of litigation and that he does not have any objection to the change in channel.

KCNO at Alturas, California, is the only station in this group that is on the air. The original allocation for KCNO was 233C1. KCNO asked for permission via rule making to move from channel 233C1 to 267C. The FCC granted this change and has ordered that KCNO move from channel 233C1 to 267C. Thus, KCNO should have no objection to operating on channel 267 as a C1 or C.

CONCLUSION

While the above counter proposal is involved, it resolves all the allocation problems in Southcentral Oregon. The mutual exclusive problem between two NCE applicants at Keno, Oregon,

would be resolved. The mutual exclusive problem between one NCE applicant and one commercial applicant at Merrill, Oregon, would be resolved. The other stations involved in the channel swaps have no objections or are in favor to the changes. This counter proposal would be a win-win situation with no losers.

Dated: 14 Oct 99.

Frank Kato

Franck Kato
Fatima Response, Inc.
PO Box 111
Keno, OR 97627
541-884-8167

**Motion Corp.
Klamath, OR**

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Friday, October 15, 1999

Dataworld FM Spacing Study

Title: Lakeview, OR

Channel: 235 C1 (94.9 MHz)

Database: DW 10/6/1999 5:29:25 PM

Latitude: N 41° 50' 03.0"
Longitude: W 120° 21' 03.0"
Safety Zone: 100.0 km

Call City of License	Auth	Licensee name St	FCC File Number	Chan Freq	HAAT(m) HAMS(L(m)	ERP (kW)	Latitude Longitude	Br-to -from	Dist (km)	Req (km)
KNCO-FM Grass Valley	Lic	Nevada County Broadcasters, Inc. CA	BLH-821108BC	232 A 94.3	299.0 1190.0	0.29 H 0.29 V	N 39° 14' 44.0" W 120° 57' 52.0"	190.4 10.0	292.1 217.1	75.00 CLEAR
KCNO Alturas	Lic	KCNO, Inc. CA	BLH-890920KE	233 C1 94.5	-59.0 1520.0	100 H 100 V	N 41° 33' 50.0" W 120° 24' 55.0"	190.1 10.1	30.49 -51.5	82.00 SHORT
KEWB Anderson	Lic	McCarthy Wireless, Inc. CA	BLH-910918KA	234 C2 94.7	477.0 1013.0	4.2 H 4.2 V	N 40° 39' 06.0" W 122° 31' 32.0"	234.8 53.4	224.7 66.68	158.0 CLEAR
KOOS North Bend	Lic	Bay Broadcasting Corporation OR	BLH-870615KB	235 C1 94.9	152.7 280.1	56 H 56 V	N 43° 23' 26.0" W 124° 07' 46.0"	300.5 117.9	355.0 110.0	245.0 CLEAR
KMXI Chico	Lic	McCoy Broadcasting Company CA	BLH-840306DD	236 B 95.1	357.0 1056.0	8.7 H 8.7 V	N 39° 56' 46.0" W 121° 43' 16.9"	209.2 28.3	239.4 44.38	195.0 CLEAR
KLCR Lakeview	CP	Woodrow Michael Warren OR	BPH-960619MF	237 C1 95.3	155.0 1760.0	51 H 51 V	N 41° 50' 03.0" W 120° 21' 03.0"	0.0 0.0	0.000 -82.0	82.00 SHORT
ALLOC Mccloud		CA		238 C3 95.5			N 41° 15' 18.0" W 122° 08' 24.0"	247.2 66.0	162.6 86.56	76.00 CLEAR
KLNA Willows Ordered to Dunnigan, CA	Lic	Pacific Spanish Network, Inc. CA	BMLH-931202KH	288 A 105.5	37.0 79.0	6 H 6 V	N 39° 31' 44.0" W 122° 10' 09.0"	211.5 30.3	298.6 276.6	22.00 CLEAR
ALLOC Merrill		OR		289 A 105.7	0.0 0.0	0 H 0 V	N 42° 01' 24.0" W 121° 36' 00.0"	281.9 101.1	105.7 83.72	22.00 CLEAR
NEW Merrill	App	Klamath Basin Broadcasting OR	BPH-951102MA	289 A 105.7	666.0 1998.9	0.11 H 0.11 V	N 42° 05' 48.0" W 121° 37' 57.0"	285.8 105.0	110.2 88.18	22.00 CLEAR
NEW Merrill	App	Terry A. Cowan OR	BPH-951109MH	289 A 105.7	656.8 1991.9	0.12 H 0.12 V	N 42° 05' 48.0" W 121° 37' 57.0"	285.8 105.0	110.2 88.18	22.00 CLEAR

>> End of channel 235 C1 study <<

**Motion Corp.
Klamath, OR**

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Friday, October 15, 1999

Dataworld FM Spacing Study

Title: Lakeview, OR

Channel: 235 C1 (94.9 MHz)

Database: FCC 10/4/1999 12:00:00 AM

Latitude: N 41° 50' 03.0"
Longitude: W 120° 21' 03.0"
Safety Zone: 100.0 km

Call	Auth	Licensee name	Chan	HAAT(m)	ERP	Latitude	Br-to	Dist	Req
City of License		St	FCC File Number	Freq	HAMSL(m)	Longitude	-from	(km)	(km)
ALLOC	VACA			232 B1		N 39° 14' 44.0"	190.4	292.1	77.00
Grass Valley		CA		94.3		W 120° 57' 52.0"	10.0	215.1	CLEAR
Site Restricted 9.1km Northeast-Effective 10-27-95-Reserved for KNCOFM per; D90-189									
KCNO	LIC	KCNO, Inc.		233 C1	-59.0	N 41° 33' 50.0"	190.1	30.49	82.00
Alturas		CA	BLH-890920KE	94.5		W 120° 24' 55.0"	10.1	-51.5	SHORT
*To amend to Channel 267C per D92-272 -- Horizontally Polarized only									
ALLOC	USED			234 C2		N 40° 39' 18.0"	234.9	224.3	158.0
Anderson		CA		94.7		W 122° 31' 21.0"	53.5	66.25	CLEAR
SITE RESTRICTED-EFFECTIVE 4-27-87-RVSD FOR KEWB PER D86-235									
KEWB	LIC	Radio Associates, Inc.		234 C2	477.0	N 40° 39' 06.0"	234.8	224.7	158.0
Anderson		CA	BLH-910918KA	94.7	1013.0	W 122° 31' 32.0"	53.4	66.68	CLEAR
ALLOC	USED			234 A		N 42° 21' 04.0"	285.2	232.7	133.0
Rogue River		OR		94.7		W 123° 04' 35.0"	103.4	99.69	CLEAR
Site restricted-Effective 9-8-92-Allotment downgraded from Class C3 to Class; A by grant of BPH-921030MB at request of applicant.									
FR	ADD	Fatima Response, Inc.		235 A		N 41° 56' 00.0"	276.5	104.3	200.0
Merrill		OR	RM-	94.9		W 121° 36' 00.0"	95.7	-95.7	SHORT
Site Restriction: 10.0 km South									
FA USE	ADD	Renaissance Community Improvemen		235 A		N 42° 07' 30.0"	284.5	134.7	200.0
Keno		OR	RM-9704	94.9		W 121° 55' 42.0"	103.4	-65.3	SHORT
Drop-In allotment proposal									
ALLOC	USED			236 B		N 39° 56' 46.0"	209.2	239.4	195.0
Chico		CA		95.1		W 121° 43' 17.0"	28.3	44.38	CLEAR
Coordinates updated from LIC record BLH840306DD									
KMXI	LIC	Richardson Broadcasting Company		236 B	357.0	N 39° 56' 46.0"	209.2	239.4	195.0
Chico		CA	BLH-840306DD	95.1	1056.0	W 121° 43' 17.0"	28.3	44.38	CLEAR
KLCR	CP	Woodrow Michael Warren		237 C1	155.0	N 41° 50' 03.0"	0.0	0.000	82.00
Lakeview		OR	BPH-960619MF	95.3	1760.0	W 120° 21' 03.0"	0.0	-82.0	SHORT
One-step application--vacant allotment is 237C2-Site located in CA.									
ALLOC	USED			237 C1		N 41° 50' 03.0"	0.0	0.000	82.00
Lakeview		OR		95.3		W 120° 21' 03.0"	0.0	-82.0	SHORT
Site located in CA.; Reserved for (New FM) per one-step application 960619MF									
ALLOC	VACA			238 C3		N 41° 15' 18.0"	247.2	162.6	76.00
McCloud		CA		95.5		W 122° 08' 24.0"	66.0	86.56	CLEAR
Effective 6-17-98 per D94-76									
ALLOC	USED			288 A		N 39° 31' 44.0"	211.5	298.6	22.00
Willows		CA		105.5		W 122° 10' 09.0"	30.3	276.6	CLEAR
Coordinates updated from LIC record BLH830913AI									

**Motion Corp.
Klamath, OR**

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Friday, October 15, 1999

Dataworld FM Spacing Study

Title: Lakeview, OR
Channel: 235 C1 (94.9 MHz)
Database: FCC 10/4/1999 12:00:00 AM

Latitude: N 41° 50' 03.0"
Longitude: W 120° 21' 03.0"
Safety Zone: 100.0 km

Call City of License	Auth	Licensee name St	FCC File Number	Chan Freq	HAAT(m) HAMS L(m)	ERP (kW)	Latitude Longitude	Br-to -from	Dist (km)	Req (km)
ALLOC Merrill Effective 03-28-94	VACA	OR		289 A 105.7			N 42° 01' 24.0" W 121° 36' 00.0"	281.9 101.1	105.7 83.72	22.00 CLEAR
NEW Merrill Untimely Filed	APP	Terry A. Cowan OR	951109MH	289 A 105.7	657.0 1992.0	0.12 H 0.12 V	N 42° 05' 48.0" W 121° 37' 57.0"	285.8 105.0	110.2 88.18	22.00 CLEAR
NEW Merrill	APP	Klamath Basin Broadcasting OR	951102MA	289 A 105.7	666.0 1999.0	0.11 H 0.11 V	N 42° 05' 48.0" W 121° 37' 57.0"	285.8 105.0	110.2 88.18	22.00 CLEAR

>> End of channel 235 C1 study <<

PROOF OF SERVICE

A copy of this counter proposal comment was served on:

Rev. Sandra Soho, President
Renaissance Community Improvement Association, Inc.
PO Box 111
Klamath Falls, OR 97601-0006

by mailing a copy of same to her by First Class Mail on 15 Oct 99.

Dated: 15 Oct 99

George Smith

George Smith
Pacific Radio Engineering
PO Box 235
Klamath Falls, OR 97601

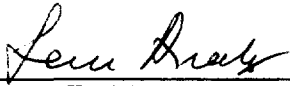
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Klamath Falls, OR 97601-0006

by mailing a copy of same to her by First Class Mail on 15 Oct 99.

Dated: 15 Oct 99



Sean Kelly
Assistant Director
Malin Christian Church, Inc.
PO Box 111
Klamath Falls, OR 97601